

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC., and SNMP
RESEARCH INTERNATIONAL, INC.,

Plaintiffs, No. 3:20-cv-00451-CEA-DCP

vs.

BROADCOM INC., BROCADE
COMMUNICATIONS SYSTEMS LLC,
and EXTREME NETWORKS, INC.,

Defendants.

OUTSIDE COUNSEL EYES ONLY

VIDEOTAPED DEPOSITION OF KAYLEE FREEMAN, a
30(b)(6) Witness, taken on behalf of the Plaintiffs
before Nissa M. Sharp, CSR No. 1365, CCR No. 528,
pursuant to Notice on the 15th of January, 2024, at
the offices of Shook Hardy & Bacon, 2555 Grand
Boulevard, Kansas City, Missouri.

1 Legal and Finance.

2 Q. Fair. Okay.

3 What's your general understanding of
4 the lawsuit?

5 MR. PRABHAKAR: Objection. Scope.
6 Objection. Vague.

7 A. Related to SNMP royalties.

8 BY MS. WEBER:

9 Q. All right, let's pull up Tab 22
10 please. This will be Exhibit 3. Let me know when
11 you're there, please.

12 A. I'm there.

13 Q. All right, you can see from the
14 caption page that these are Extreme's 11th
15 supplemental responses to SNMP Research
16 interrogatories.

17 Have you seen these before?

18 A. I have not.

19 Q. Do you know who created these?

20 A. I do not.

21 Q. Let's scroll down and look at the
22 responses.

23 So these were served on -- Extreme
24 served them on November 15, 2023. We can scroll down
25 to PDF Page 3 and look at Interrogatory No. 6. Let

Page 39

1 me know when you're there.

2 A. Okay.

3 Q. Okay, this says, With respect to each
4 product identified in response to Interrogatory Nos.
5 1 and 2, please identify the number of products
6 shipped, revenue and costs related to each and every
7 such product by quarter from October 1st, 2017, to
8 the present, including, but not limited to, any
9 internal bookkeeping or financial analysis of any
10 kind in which Extreme keeps track of the
11 profitability of each product and the number of units
12 produced of each such product.

13 Do you see that?

14 A. I do.

15 Q. Okay. Scroll down to the next page
16 please, Page 4. Like to focus on the last full
17 paragraph and we'll look at that first sentence.

18 It says, For each product identified
19 in response to Interrogatory Nos. 1 and 2, Extreme
20 identifies the number of products shipped, revenue
21 and costs by quarter from date of first sale through
22 end of Extreme's financial year 2023, June 30, 2023,
23 with reference to Appendices E-1, F-1 and G-1 that
24 are attached to this response as if they were
25 incorporated herein.

Page 40

1 Do you see that?

2 A. I do.

3 Q. Okay. Please scroll down to the
4 appendices beginning on Page 7. Page 7 is just the
5 title, so you can go to Page 8, this is E-1.

6 Have you seen this appendices before?

7 A. I have not seen it before.

8 Q. Do you know who created this?

9 A. I do not.

10 Q. So you don't know who created it, and
11 I assume you obviously did not speak with the person
12 who created them about how they were prepared,
13 correct?

14 MR. PRABHAKAR: Objection.
15 Argumentative.

16 A. I do not know.

17 BY MS. WEBER:

18 Q. So, on Page 8, you can see that it
19 identifies in the columns at the top the, sorry, at
20 the very top of the page -- withdrawn. Let me start
21 over.

22 You can see on Page 8 at the very top
23 it says, EOS Volume, Revenue, Cost and Gross Margin,
24 correct?

25 MR. PRABHAKAR: Objection. Vague.

Page 41

C E R T I F I C A T E

I, Nissa M. Sharp, a Certified Court
Reporter, do hereby certify:

That prior to being examined the witness was
by me duly sworn;

That said deposition was taken down by me in
shorthand at the time and place hereinbefore stated
and was thereafter reduced to writing under my
direction;

That I am not a relative or employee or
attorney or counsel of any of the parties, or a
relative or employee of such attorney or counsel, or
financially interested in the action.

The original transcript is in the custody of:

Ms. Olivia Weber

Irell & Manella, LLP

1800 Avenue of the Stars

Suite 900

Los Angeles, California 90067

WITNESS my hand and seal this 17th day of
January, 2024.



Nissa M. Sharp

CSR No. 1365, CCR No. 528